



## REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Owens Corning EPA ID# OH D055352512  
ALIAS SITE NAME(S): Reynolds Metals Co Bldg Prod Pkt  
CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: OH  
REPORT DATED: 11/2000 REPORT TYPE: Memo  
REPORT PREPARER: EPA - SF/RCRA SITE TYPE: GAO ☒ IG

DISCUSSION/RATIONALE: "Lead Confirmed" - site deferral to  
RCRA is correct.

Special Initiative Flags entered,  
see attached.

Report Reviewed/  
Site Decision Made by: \_\_\_\_\_

Date: \_\_\_\_\_

11/15/00

Region 5 Revision of EPA Form # 9100-3,11/00 - Special - IG Audit



State of Ohio Environmental Protection Agency

**Central District Office**

**STREET ADDRESS:**

3232 Alum Creek Drive  
Columbus, OH 43207-3417

**TELE:** (614) 728-3778 **FAX:** (614) 728-3898

**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

February 29, 2000

Re: No Further Action Planned for  
AmeriMark Building Products d/b/a  
Owens Corning Metal Systems  
(AKA Reynolds Metals)  
OHD055352512

Ms. Jeanne Griffin  
Ohio Early Action Project Manager, SE-4J  
Office of Superfund  
U.S. EPA  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Dear Ms. Griffin:

Ohio EPA has completed a file review of AmeriMark Building Products d/b/a Owens Corning Metal Systems (formerly Reynolds Metals) located at 1 Reynolds Way Road in Ashville, Pickaway County, Ohio. The facility is identified in the Inspector General's RCRA Deferral Audit of sites as a "RCRA Handler not subject to corrective action". Reynolds Metals built the facility in 1971 and sold it to AmeriMark in 1997. AmeriMark was subsequently purchased by Owens Corning. I will refer to the facility as Reynolds.

Reynolds filed for a RCRA Part A Permit in 1980. In 1984, they withdrew their permit because they did not store hazardous waste for more than 90 days. Also, on-site wastewater treatment lagoons were determined to be exempt from RCRA regulations because they were part of a permitted wastewater treatment unit regulated under the Clean Water Act. Since 1984, Reynolds has operated as a large quantity generator. Listed wastes generated at the facility include methyl ethyl ketone, paint waste, and wastewater treatment sludge.

In 1984, Ohio EPA completed a preliminary assessment (PA) for CERCLA action and recommended no further action. On July 11, 1991, U.S. EPA conducted a preliminary assessment/visual site inspection (PA/VSI). The final PA/VSI Report could not be located in Ohio EPA files. In 1994, Ohio EPA updated and revised the original 1984 PA for state action. Ohio EPA gave the site a low priority for state action.

There are two areas at the facility where documented releases of contamination have occurred:

1. Chrome cake sludge from wastewater treatment was found buried on the property in 1992. Reynolds excavated 794 cubic yards of sludge and underlying contaminated soil and sent it to a hazardous waste landfill. Ohio EPA was informed of the discovery and subsequent clean-up, but was not otherwise involved.



Ms. Jeanne Griffin  
Ohio Early Action Project Manager, SE-4J  
U.S. EPA  
Page -2-

2. Investigations of the two wastewater settling lagoons indicate that they have adversely impacted the underlying soil and ground water with chromium and possibly other inorganics. The lagoons are currently in the process of being removed. Ohio EPA's Division of Surface Water (DSW) issued a permit-to-install (PTI) on February 23, 2000 for the lagoon removal, but the permit does not require Reynolds to address the soil and ground water contamination.

Because Reynolds held a Part A Permit, they are subject to RCRA Corrective Actions. Reynolds is not listed in the Government Performance and Results Act, Ohio Corrective Action Baseline List (5/21/99). Reynolds is listed in the RCRA National Corrective Action Prioritization System (NCAPS) as a low priority.

Ohio EPA recommends that Reynolds be deferred to RCRA and the Clean Water Act (NPDES Permit). If additional information becomes available identifying CERCLA-related concerns, Ohio EPA will evaluate the site for additional actions under the state clean-up program.

This should fulfill the FFY 2000 review and assessment commitment for this facility.

If you have any questions or need additional information, please contact me at (614) 728-3830.

Sincerely,



Fred Myers  
Division of Emergency & Remedial Response  
Central District Office

FM/pan

reynoldsltr2

cc: Laura Fay, DERR, CO  
Steve Rath, DHWM/CDO  
DERR/CDO File



# Superfund Site Assessment Data Management

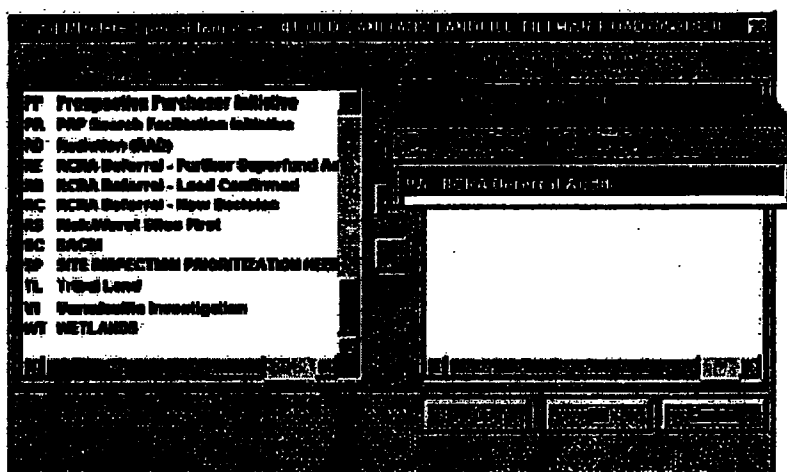
EPA - Office of Emergency and Remedial Response

## Reporting RCRA Deferral Activities

July 2000

### What are RCRA Deferral Sites?

A March 1999 report by EPA's Office of the Inspector General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA) program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WastelAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives: RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WastelAN action, "Site Reassessment", that will track reassessment activities at sites.

### How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WastelAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

### How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WastelAN Special Initiatives. The new Regional Special Initiatives are:

- **RCRA Deferral—Lead Confirmed:** Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- **RCRA Deferral—New Decision:** Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- **RCRA Deferral—Further Superfund Assessment:** Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WastelAN action.



rcradfml.pdf

### Who Can I Contact for More Information?

Jennifer Gieseler - Data Sponsor (703) 603-6339 [gieseler.jennifer@epa.gov](mailto:gieseler.jennifer@epa.gov)  
Wendy Allen, Plumber (703) 247-4744 [allen.wendy@epa.gov](mailto:allen.wendy@epa.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Dufficy  
Brownfield/Early Action Section  
Superfund Division

Gerald Phillips  
Corrective Action Manager  
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) \*

cc: State Site Assessment Contacts  
EAPMs

\* FOR ATTACHMENTS PLEASE REFER TO THE FOLLOWING TWO SITE FILES:

AKZO COATINGS INC. IAD006390553

AG COMMUNICATION Sys. IAD005070545